

Before the  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

COMMENT TO RESPONSE OF THE UNITED STATES  
POSTAL SERVICE TO ORDER NO. 1366

Docket No. MC2012-26

Post-Haste Mail Center Inc

The enhanced PO Box services currently being offered by the Post Office create a competitive product with an unfair competitive advantage. We are a small neighborhood business that will have a negative impact on our sales as PO Box enhancements become fully implemented and general knowledge.

The enhanced PO Box services currently being offered that I oppose include:

- Offering Post Office Box renters the use of the Post Office street address for Post Office Box addressing.
- Removing the PO Box designation when using a street address.
- Offering Post Office Box renters email notification of mail delivery.
- Offering Post Office Box renters the ability to receive packages from private carriers.

In reality, these enhancements allow the USPS to offer an identical service to Private Mail Box (PMB) Service. The CMRA regulations established by the USPS create an unfair advantage for the USPS in offering those services. Those unfair regulatory advantages include, but are not limited to:

- The requirement to handle mail for 6 months for departed or cancelled customers. As a store owner, I have to apply new postage to any item that is forwarded during this term.
- The inability for PMB customers to file a change of address form once their contract has ended with the CMRA.
- The inability for PMB customers to get the same free forwarding service offered to PO Box customers.

Additionally, the USPS has publicly expressed their desire to move from 6-day to 5-day delivery. The USPS has repeatedly stated that as their plan stands today, PO Box customers would continue to receive 6-day delivery while PMB customers would not. Should the Post Office to get approval of their desired 5-day delivery plan, they would gain yet another unfair advantage over PMB service.

Following are some direct lines from the USPS Elective Filing and my thoughts on those lines:

“The Service Enhancements introduced at certain Competitive PO Box Service locations do not constitute products.” – Page 1, Attachment A

- The ability to use a Street Address creates a new product – PO Boxes with street addresses. A product is defined in 39 USC 102(6) as a postal service with a distinct cost or market characteristic for which a rate or rates are, or may reasonably be, applied. PO Box customers must elect to use the Street addressing service, and when doing so will use that new address to portray himself to the public in a very different way.

In Answer to Question 4 of Order 997, the USPS says: “Our competitors emphasize that they accept shipments from all private carriers when they promote their mailbox services. This is clearly an option sought by customers of private mailbox providers.” – Page 8, Attachment A

- Note that the USPS itself says this is an option sought by PMB customers. They make no mention of this being an option sought or requested by PO Box customers. These “enhancements” are clearly meant to target PMB Providers and their customers.

“PMB providers often include, at no additional charge, features similar to the enhancements at issue in this proceeding.” – Page 4, Attachment B

- PMB Providers often include the charges for these additional services in their single PMB rate. In fact, when PMB providers add a new “enhancement” like real-mail notification, they will often increase the rate of the box to cover the costs associated with offering that service.

“The service enhancements at issue do not modify the rates.” – Page 2, Attachment A

- Yet, a portion of the price increase is being used to pay for these services. So, the USPS raised the rates. Then they added enhancements to justify rates. Yet, now they would argue that these enhancements do not modify the rates. It seems more valid to argue that the increased rates are directly linked to the enhancements.

It is unreasonable to ask small businesses like myself to compete with the Post Office when that entity gives itself regulatory advantages on like services and products. When the Post Office first sought to move the PO Box service from the Market Dominant to Competitive category, no mention was made of adding any enhancements. These enhancements change the basic product, and when combined with the CMRA regulations, create a distinct and unfair competitive advantage for the USPS.

I respectfully request that the Commission advise the Post Office to cease offering these PO Box enhancements as soon as possible.

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8-7-12